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*Counsel for Mark D. Waldron, Chapter 7 Trustee*

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a  
Washington corporation,  
Debtor.

Case No. 18-03197 FPC 7

The Honorable Frederick P. Corbit  
Chapter 7

**DECLARATION OF PAMELA M. EGAN  
IN SUPPORT OF NOTICE OF MOTION  
AND MOTION OF THE POTOMAC LAW  
GROUP PLLC FOR SANCTIONS  
AGAINST HANSON BAKER LUDLOW  
DRUMHELLER, P.S., LACEE L. CURTIS  
AND DOUGLAS R. CAMERON  
PURSUANT TO BANKRUPTCY RULE  
9011; NOTICE THEREON**

I, Pamela M. Egan pursuant to 28 U.S.C. § 1746 hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration.

2. I am a partner with the law firm of Potomac Law Group PLLC (“PLG”), which represents Mark D. Waldron, the Chapter 7 Trustee, as general counsel in the above-captioned case. I submit this declaration in support of the *Notice of Motion and Motion of the Potomac Law Group PLLC for Sanctions Against Hanson Baker Ludlow Drumheller, P.S., Lacey L. Curtis, and Douglas R.*

EGAN DECL. IN SUPPORT OF  
RULE 9011 MOTION (HANSON BAKER) -- Page | 1

1 *Cameron Pursuant to Bankruptcy Rule 9011; Notice Thereon* (the “Motion”), filed  
2 herewith.

3 3. The statements made herein are based on my personal knowledge. If  
4 called to testify I would and could testify competently to the statements made  
5 herein.

6 4. On September 3, 2024, I sent a letter and a copy of the Motion which  
7 are attached hereto as **Exhibit A** to Douglas Cameron and Lacey Curtis, Jun  
8 Dam’s attorneys.

9 5. On September 6, 2024, Douglas Cameron and I conferred regarding  
10 the facts and circumstances underlying the Motion.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Executed this 6th day of September 2024 in Seattle, Washington.

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14 *Pamela M. Egan*

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Pamela M. Egan

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TRUSTEE’S MOTION FOR A  
PRE-FILING REVIEW ORDER  
AGAINST JUN DAM - Page | 1